

DEP Air Quality Reports

From: Andrew Frye <afrye@argos-us.com>
Sent: Friday, September 7, 2018 1:57 PM
To: DEP Air Quality Reports
Cc: Miranda Brown
Subject: Martinsburg Cement Title V semi-annual report - AFS Plant ID Number: 03-54-00300006
Attachments: WVDEP SemiAnnual Monitor Report Jan-June 2018 Signed 9-6-18.pdf

Dear WVDEP Air Quality,

Please find attached our Title V Operating Permit – Semi –Annual Monitoring Report.

If you have any questions please contact me.

Regards,

Andrew A Frye
Environmental Manager
Martinsburg Cement Plant
Argos USA

1826 South Queen Street
Martinsburg, WV, 25401
Office: 304-260-1827
Cell : 304-261-8746
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**WV Division of Air Quality**601 57th Street SE

Charleston, WV 25304

Telephone Number: (304) 926-0475

Fax Number: (304) 926-0478

TITLE V OPERATING PERMIT SEMI-ANNUAL MONITORING REPORT

Name of Permittee: Argos USA LLC	Name of Facility: Martinsburg Plant
Permit Number: R30-00300006-2017	AFS Plant ID Number: 03-54-00300006
Mailing Address: 1826 South Queen Street Martinsburg, WV 25401	Contact Person: Andrew Frye Title: Environmental Manager Telephone: (304) 260-1827
For the reporting period beginning 01 / 01 / 2018 and ending 6 / 30 / 2018	
Based upon the specific test methods, monitoring, record keeping and/or reporting required under the permittee's Title V Operating Permit and any other information reasonably available, I, the undersigned, hereby certify for the reporting period stated above that based on information and belief formed after reasonable inquiry, the statements and information in this document and attachments are true, accurate, and complete. ¹	
Responsible Official ²	
Name: Heinz Knopf	Title: Plant Manager
Signature: 	Date: 
Note: Please check all required attachments included with this Semi-Annual Monitoring Report.	
<input checked="" type="checkbox"/> Form B - Semi-Annual Monitoring Report ³	<input checked="" type="checkbox"/> Form C - Deviation Report ³
<p>¹ Please note that the West Virginia Code states that any person who knowingly misrepresents any material fact in an application, record, report, plan or other document filed or required to be maintained is guilty of a misdemeanor and may be subject to fines and/or imprisonment in accordance with W.V.A. Code §22-5-6(b).</p> <p>² A Responsible Official as defined by 45CSR§30-2.38. must sign this certification.</p> <p>³ Submit signed electronic copy by e-mail to: DEPAirQualityReports@wv.gov</p>	

Form B - Semi-Annual Monitoring Report

Permittee: **Error! Reference source not found.**

Facility: **Error! Reference source not found.** Martinsburg Plant

Permit Number: R30-00300006-2017

For the reporting period beginning 01/ 01/ 2018 and ending 06/ 30/ 2018

Emission Unit ID	Monitoring, Data, or Analysis Required by the Permit	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
EU2, EU3, EU4, EU5, EU6, EU7, EU8	Permit Term 3.2.1 - O&M Plan must be developed, include the information listed in Permit Terms 3.2.1(1) through 3.2.1(4), and submitted to the WV DEP as part of the Part 70 permit application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.2 – Finish Mill 1 and 2 COMs shall be calibrated, maintained, and continuously operated as required during the reporting period.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/30/18 – PC MACT Semiannual Summary Report Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.4 - Daily 6-minute Method 22 visible emission monitoring shall be conducted on all raw mill and finish mill sources to demonstrate compliance with their 10% opacity limit. [NOTE: Raw mill is part of the kiln system and monitored by the kiln system PM CPMS.]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/30/18 – PC MACT Semiannual Summary Report Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.4(1-2) - A second Method 22 must be conducted within 24 hours if visible emissions are observed during daily monitoring. If visible emissions are observed during the second Method 22, a 30-minute Method 9 observation must be conducted.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.4(Corrective Actions) - Corrective actions must be initiated within one hour if visible emissions are observed during daily monitoring.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EP42.04	Permit Term 3.2.5(1- 5) - Thermocouples shall be calibrated, maintained and operated as required during the reporting period. The thermocouple temperatures must be monitored and continuously recorded and 3-hour rolling averages must be calculated to demonstrate compliance with temperature limits. Thermocouples must be calibrated at least once every three months.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/30/18 – PC MACT Semiannual Summary Report Attachment ID:

All sources must complete this section. Use the table above to summarize all required monitoring, data, or analyses for the 6-month period. In the first column, list the emission units upon which the monitoring was performed. Use any Emission Unit ID's assigned in the permit, if no ID's in permit, generally describe. In the second column, describe the monitoring, data, or analysis and cross-reference the relevant permit term. In the third column indicate whether a separate monitoring report is required. Lastly, complete the fourth column only if you are required to submit a separate monitoring report. If submitted previously, indicate the date you submitted it; if submitted for the first time as an attachment to this form, assign an attachment identification (ID), mark the attachment with that ID, and attach the separate monitoring report to this form.

Form B - Semi-Annual Monitoring Report

Permittee: Error! Reference source not found.		Facility: Error! Reference source not found. Martinsburg Plant	Permit Number: R30-00300006-2017
For the reporting period beginning 01/ 01/ 2018 and ending 06/ 30/ 2018			
Emission Unit ID	Monitoring, Data, or Analysis Required by the Permit	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
EU2, EU3, EU4, EU6, EU7	Permit Term 3.2.7 - All sources subject to an opacity limit under Permit Term 3.1.20 shall monitor opacity as specified in the O&M Plan.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/30/18 – PC MACT Semiannual Summary Report Attachment ID:
EU2, EU3, EU4, EU6, EU7	Permit Term 3.2.7(1) – Monthly 10 minute visible emission testing shall be conducted on all affected sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/30/18 – PC MACT Semiannual Summary Report Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.7(2) - Daily 6-minute Method 22 visible emission monitoring shall be conducted on all raw mill and finish mill sources. [NOTE: Raw mill is part of the kiln system and monitored by the kiln system PM CPMS.]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EU3, EU4, EU6, EU7	Permit Term 3.2.9 (1-6) – Approval of alternate monitoring requirements.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.10 Raw Mill and Finish Mill Opacity Monitoring Alternatives. The Martinsburg Plant operates a PM CPMS for the inline raw mill (as part of the kiln system) and COMS for Finish Mill 1 and Finish Mill 2 to demonstrate compliance with their 10% opacity limit.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/30/18 – PC MACT Semiannual Summary Report Attachment ID:
Facility-Wide	Permit Term 3.2.12 - Visible emission observations must be conducted weekly on all fugitive particulate emission activities to determine compliance with opacity limit.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
Facility-Wide	Permit Term 3.2.13 - Visible emission observations must be conducted weekly on all dust collectors and documentation must be maintained on all dust collector pressure drop observations.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:

All sources must complete this section. Use the table above to summarize all required monitoring, data, or analyses for the 6-month period. In the first column, list the emission units upon which the monitoring was performed. Use any Emission Unit ID's assigned in the permit, if no ID's in permit, generally describe. In the second column, describe the monitoring, data, or analysis and cross-reference the relevant permit term. In the third column indicate whether a separate monitoring report is required. Lastly, complete the fourth column only if you are required to submit a separate monitoring report. If submitted previously, indicate the date you submitted it; if submitted for the first time as an attachment to this form, assign an attachment identification (ID), mark the attachment with that ID, and attach the separate monitoring report to this form.

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Permit Number: R30-00300006-2017

For the reporting period beginning 01/ 01/ 2018 and ending 06/ 30/ 2018

Emission Unit ID	Monitoring, Data, or Analysis Required by the Permit	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
Facility-Wide	Permit Term 3.2.14 - Daily records must be kept of all dust suppression used. Weekly dust control system inspections must be done from May 1 through Sept. 30 and monthly from Oct. 1 through April 30. Records must be kept of all maintenance, and must state whether any maintenance/corrective action was taken as a result of the weekly/monthly inspections and the times that the dust control systems were inoperable and any corrective actions taken.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
Facility-Wide	Permit Term 3.2.15 – Development of a Site Specific Monitoring Plan for all emission limits which the Plant demonstrates compliance with through performance stack testing or emission monitoring per 40 CFR 63.1350(p).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
Facility-Wide	Permit Term 3.2.16 – A Continuous Emission Rate Monitoring System must be installed, operated, calibrated, and maintained for PM, THC (or OHAPS), HCl (or SO ₂), and Mercury to demonstrate compliance with applicable emission limits.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/30/18 – PC MACT Semiannual Summary Report Attachment ID:
Facility-Wide	Permit Term 3.2.17 – Parameter monitoring requirements for the operation and maintenance of each continuous parameter monitoring system.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EP42.04	Permit Term 4.2.2 - WVDEP can require monitoring devices to be installed to demonstrate SO ₂ compliance with 45CSR10-8.2.a. The Plant currently operates a CEMS to demonstrate compliance with the 2000 ppmv limit.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EP42.04	Permit Term 4.2.4 – A CEMS shall be installed, operated, and maintained to measure emissions of SO ₂ , NO _x , THC and CO from the kiln system stack.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:

All sources must complete this section. Use the table above to summarize all required monitoring, data, or analyses for the 6-month period. In the first column, list the emission units upon which the monitoring was performed. Use any Emission Unit ID's assigned in the permit, if no ID's in permit, generally describe. In the second column, describe the monitoring, data, or analysis and cross-reference the relevant permit term. In the third column indicate whether a separate monitoring report is required. Lastly, complete the fourth column only if you are required to submit a separate monitoring report. If submitted previously, indicate the date you submitted it; if submitted for the first time as an attachment to this form, assign an attachment identification (ID), mark the attachment with that ID, and attach the separate monitoring report to this form.

Form B - Semi-Annual Monitoring Report

Permittee: Error! Reference source not found.		Facility: Error! Reference source not found. Martinsburg Plant	Permit Number: R30-00300006-2017
For the reporting period beginning 01/ 01/ 2018 and ending 06/ 30/ 2018			
Emission Unit ID	Monitoring, Data, or Analysis Required by the Permit	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
Facility-Wide	Permit Term 4.2.5 – Daily and monthly records are required to be maintained of the quantity of clinker transferred to the outdoor clinker storage pile.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EP42.04	Permit Term 4.2.6 – The owner/ operator of any kiln subject to 45 CSR 40-100 must complete annual NOx testing if a NOx CEMS is not used.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	11/8/17 – Annual NOx Report Attachment ID:
EP42.04	Permit Term 4.2.7 – The owner/operator of a combustion source shall demonstrate compliance with 45CSR10-3, 4, and 5 by monitoring according to one of the methods specified in Term 4.2.7. The Plant uses a CEMS to monitor compliance with the 2000 ppmv SO ₂ limit.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EU4	Permit Term 4.2.8 – Weekly visible emission observations shall be conducted on the clinker handling and storage emission sources.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EU5	Permit Term 4.2.10 – An initial performance test in accordance with Reference Method 9 of Appendix A of 40CFR60 shall be conducted to demonstrate compliance with opacity standards for all new sources subject to 40 CFR 60 Subpart Y.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:
EU6	Permit Term 4.2.12 - Alternate Monitoring Provisions – The requirements to conduct daily Method 22 testing shall not apply to any raw mill or finish mill equipped with a COMS or BLDS. Finish Mill 1 and Finish Mill 2 both have COMS installed, maintained, calibrated, and operated to demonstrate their compliance with their 10 % opacity limit.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	7/30/18 – PC MACT Semiannual Summary Report Attachment ID:
Transloader	Permit Term 4.2.14 – The Permittee shall maintain monthly records of the amount of fuel used by the rail transloader engine.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MM / DD / YYYY Attachment ID:

All sources must complete this section. Use the table above to summarize all required monitoring, data, or analyses for the 6-month period. In the first column, list the emission units upon which the monitoring was performed. Use any Emission Unit ID's assigned in the permit, if no ID's in permit, generally describe. In the second column, describe the monitoring, data, or analysis and cross-reference the relevant permit term. In the third column indicate whether a separate monitoring report is required. Lastly, complete the fourth column only if you are required to submit a separate monitoring report. If submitted previously, indicate the date you submitted it; if submitted for the first time as an attachment to this form, assign an attachment identification (ID), mark the attachment with that ID, and attach the separate monitoring report to this form.

Form C – Deviation Report¹

Permittee: Error! Reference source not found.		Facility: Error! Reference source not found. Martinsburg Plant		Permit Number: R30-00300006-2017	
For the reporting period beginning 01/ 01/ 2018 and ending 06/ 30/ 2018					
Emission Unit ID	Condition Number of Permit Requirement	Term or Condition that is the Basis for Certification	What was the deviation ² from the Term or Condition?	What was the cause for the deviation ² And what type of corrective measures were taken?	Deviation Time Period Date (mo/day/yr) Time (hr:min)
EP42.04	Permit Term 3.2.5(1-5)	The thermocouple temperatures must be monitored and continuously recorded and 3-hour rolling averages must be calculated to demonstrate compliance with temperature limits. Thermocouples must be re-calibrated once every three months.	The Kiln Bypass Baghouse thermocouple recorded 3-hour rolling averages which were greater than the temperature limits set during the most recent Dioxin/Furan Stack Test.	As documented in the PC MACT Summary Report submitted on 7/30/18.	As documented in the PC MACT Summary Report submitted on 7/30/18.
Facility-Wide	Permit Term 3.2.7(1)	Monthly 10-minute visible emission testing shall be conducted on all affected sources. If visible emissions are observed than a 30-minute method 9 is required to be conducted within one hour.	The required follow-up 30-minute method 9 tests were not completed when visible emissions were overserved during Monthly Method 22 visible emission observations on three occasions.	Training has been conducted on required monitoring and record retention policies.	Date (# of emission units for which a visible emission was observed): 1/19/18 (2 emission units) 2/8/18 (1 emission unit) 2/20/18 (2 emission units) 3/21/18 (2 emission units) 4/20/18 (3 emission units) 5/30/18 (1 emission unit) 5/31/18 (2 emission units) 6/26/18 (2 emission units)
EP42.04	Permit Term 3.2.16	A Continuous Emission Rate Monitoring System must be installed, operated, calibrated, and maintained for PM, THC (or OHAPS), HCl (or SO ₂), and Mercury to demonstrate compliance with applicable emission limits.	On 3/7/2018, the Martinsburg Plant calculated a 30-day rolling average Mercury emission rate of 57.2 lb/MMton clinker, which exceeded their 55 lb/MMton clinker 30-day rolling Mercury emission limit. It should also be noted that the mA parametric site-specific operating limit (SSOL) for PM was exceeded in March 2018. However, the PM retest was completed on 4/25-26/18 and a new SSOL was established on 5/13/18, within the required 45 operating days of the initial exceedance. Only two PM performance tests were conducted within the last 12-months, so no violation of the PM standard occurred.	The carbon system injectors were partially plugged on 3/7/18 with limited carbon injection for a duration of one day. The carbon system was unplugged and restored.	3/7/2018

¹If there are no deviations to report for this period, place "None" in the first row on the form.

²A deviation is defined as any period when the permittee failed to meet the terms or conditions of their permit. A deviation is not necessarily a violation. Violations will be determined by DAQ and/or EPA.

Form C – Deviation Report¹

Permittee: **Error! Reference source not found.**

Facility: **Error! Reference source not found.** Martinsburg Plant

Permit Number: R30-00300006-2017

For the reporting period beginning 01/ 01/ 2018 and ending 06/ 30/ 2018

Emission Unit ID	Condition Number of Permit Requirement	Term or Condition that is the Basis for Certification	What was the deviation ² from the Term or Condition?	What was the cause for the deviation ² And what type of corrective measures were taken?	Deviation Time Period Date (mo/day/yr) Time (hr:min)
EP42.04	Permit Term 3.2.16	A Continuous Emission Rate Monitoring System must be installed, operated, calibrated, and maintained for PM, THC (or OHAPS), HCl (or SO ₂), and Mercury to demonstrate compliance with applicable emission limits.	The continuous emission monitoring systems for PM and Mercury experienced downtime during the reporting period and were not continuously operated. (Note: The THC and SO ₂ CEMS also experienced downtime and are documented under Permit Term 4.2.4).	Deviations were due to CEMS/CPMS malfunctions. In each incidence, every effort was taken by the maintenance and electrical departments to bring the CEMS/CPMS back up to normal operation as quickly as possible.	<p>PM CPMS:</p> <p>01/06/18 03:00 to 01/06/18 03:59 02/21/18 14:00 to 02/21/18 17:59 02/21/18 12:00 to 02/21/18 12:59 04/24/18 17:00 to 04/24/18 18:59</p> <p>Mercury CEMS:</p> <p>01/06/18 03:00 to 01/06/18 04:59 04/26/18 02:00 to 04/26/18 02:59 02/27/18 14:00 to 02/27/18 14:59 05/02/18 23:00 to 05/02/18 23:59 02/27/18 16:00 to 02/27/18 16:59 05/03/18 02:00 to 05/03/18 02:59 02/28/18 08:00 to 02/28/18 08:59 05/09/18 23:00 to 05/09/18 23:59 02/28/18 11:00 to 02/28/18 12:59 05/10/18 09:00 to 05/10/18 09:59 02/28/18 14:00 to 02/28/18 14:59 05/12/18 16:00 to 05/12/18 20:59 02/28/18 16:00 to 02/28/18 16:59 05/15/18 17:00 to 05/15/18 18:59 03/02/18 08:00 to 03/02/18 08:59 05/16/18 23:00 to 05/16/18 23:59 03/03/18 08:00 to 03/03/18 08:59 05/23/18 23:00 to 05/23/18 23:59 03/04/18 08:00 to 03/04/18 08:59 05/24/18 02:00 to 05/24/18 02:59 03/05/18 03:00 to 03/07/18 16:59 06/11/18 12:00 to 06/11/18 12:59 03/07/18 23:00 to 03/07/18 23:59 06/11/18 14:00 to 06/11/18 14:59 03/08/18 02:00 to 03/08/18 02:59 06/13/18 23:00 to 06/13/18 23:59 04/10/18 09:00 to 04/10/18 10:59 06/14/18 02:00 to 06/14/18 02:59 04/11/18 23:00 to 04/11/18 23:59 06/16/18 13:00 to 06/16/18 16:59 04/12/18 02:00 to 04/12/18 02:59 06/27/18 10:00 to 06/27/18 10:59 04/18/18 23:00 to 04/18/18 23:59 06/27/18 23:00 to 06/27/18 23:59 04/19/18 02:00 to 04/19/18 02:59 06/28/18 02:00 to 06/28/18 02:59 04/24/18 09:00 to 04/24/18 09:59 06/29/18 18:00 to 06/29/18 23:59 04/24/18 16:00 to 04/24/18 18:59 06/30/18 03:00 to 06/30/18 03:59 04/25/18 23:00 to 04/25/18 23:59 06/30/18 06:00 to 06/30/18 07:59</p>

Form C – Deviation Report¹

Permittee: Error! Reference source not found.		Facility: Error! Reference source not found. Martinsburg Plant		Permit Number: R30-00300006-2017	
For the reporting period beginning 01/ 01/ 2018 and ending 06/ 30/ 2018					
Emission Unit ID	Condition Number of Permit Requirement	Term or Condition that is the Basis for Certification	What was the deviation ² from the Term or Condition?	What was the cause for the deviation ² And what type of corrective measures were taken?	Deviation Time Period Date (mo/day/yr) Time (hr:min)
EP42.04	Permit Term 4.2.4	The SO ₂ , NO _x , THC, and CO CEMS must be continuously operated.	CEMS records indicate several periods during the reporting period when the SO ₂ , NO _x , and CO CEMS malfunctioned and no data was recorded or the data was recorded as invalid.	Deviations were due to CEMS malfunctions. In each incidence, every effort was taken by the maintenance and electrical departments to bring the CEMS back up to normal operation as quickly as possible.	01/06/18 03:00 to 01/06/18 04:59 05/15/18 13:00 to 05/15/18 14:59 04/08/18 06:00 to 04/08/18 07:59 05/27/18 00:00 to 05/27/18 08:59 04/08/18 09:00 to 04/08/18 12:59 06/13/18 09:00 to 06/13/18 10:59 04/18/18 09:00 to 04/18/18 09:59 06/16/18 14:00 to 06/16/18 15:59 04/24/18 17:00 to 04/24/18 18:59
EP42.04	Permit Term 4.2.4	The SO ₂ , NO _x , THC, and CO CEMS must be continuously operated.	CEMS records indicate several periods during the reporting period when the THC CEMS malfunctioned and no data was recorded or the data was recorded as invalid.	Deviations were due to CEMS malfunctions. In each incidence, every effort was taken by the maintenance and electrical departments to bring the CEMS back up to normal operation as quickly as possible.	01/06/18 03:00 to 01/06/18 03:59 05/27/18 00:00 to 05/27/18 08:59 04/18/18 09:00 to 4/18/18 09:59 06/13/18 09:00 to 06/13/18 10:59 04/24/18 17:00 to 04/24/18 18:59 06/16/18 14:00 to 06/16/18 15:59 05/15/18 13:00 to 05/15/18 14:59

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